



# ARM Group Inc.

Engineers and Scientists

August 19, 2019

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Interim Use Work Plan:  
Wind Power Project  
Area B: Parcel B5 and Parcel B13  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group Inc. (ARM) is pleased to submit the following Interim Use Work Plan to the Maryland Department of the Environment (MDE). This Interim Use Work Plan requests agency approval to construct a new laydown area and to make use of an existing paved area as staging land, tasks which are collectively designated as the Wind Power Project (the Site). The Site is located to the south of the former Pennwood Powerhouse on the Tradepoint Atlantic property and is comprised of two separate areas, the Laydown Land in Parcel B5 and Parcel B13, and the Quayside Staging Land in Parcel B5 (overlapping partially with the A-Yard development) adjacent to the turning basin.

## Project Background

The Wind Power Project does not represent a permanent use of this area of the Tradepoint Atlantic property. This Interim Use Work Plan is being submitted to facilitate site improvements including a temporary capping remedy to be protective of workers. This work is not intended to be the basis for the issuance of a No Further Action Letter or a Certificate of Completion. While a full RADWP is not warranted (because the proposed use of the Site is not permanent), the scope of work will be subject to many of the standard requirements specified by multiple RADWPs previously approved by the agencies.

## Project Description

Site layout exhibit drawings are provided as **Attachment 1** (Laydown Land) and **Attachment 2** (Quayside Staging Land). The Site is proposed to be utilized for roughly 36 months to facilitate laydown and storage of offshore wind turbine generator components. The components will be delivered to Tradepoint Atlantic as an intermediary stop before being transported to their final

destination at the offshore wind site. Potential components range in size but could be up to approximately 800 metric tons each. Appropriate weight spreading equipment and transport vehicles will be utilized to facilitate movement of the components on-site. The Laydown Land will be rough graded and covered with 4 inches of slag aggregate covered by a temporary cap consisting of 4 inches of certified clean crushed recycled concrete. The Quayside Staging Land will overlap partially with the A-Yard development where paving is currently in progress. The entire Quayside Staging Land area has already been paved in support of A-Yard development. No intrusive construction work (other than rough grading of the Laydown Land) is anticipated to occur during this project.

### Work Requirements

The construction of the Site will remain subject to the implementation protocols outlined in recent RADWPs, including the following:

- Oversight will be provided by an Environmental Professional (EP) during interim remedy installation, as well as any intrusive construction activities.
- Development activities will be conducted under a Health and Safety Plan (HASP).
- Soil screening requirements will be implemented as required.
- Erosion and sediment controls will be installed as required.
- Dust monitoring will be implemented as required.
- If dewatering is necessary, sampling and disposal will be conducted as required.

Because no intrusive activities other than rough grading are proposed, standard Level D Personal Protective Equipment (PPE) will be used for the entire scope of work covered by this Interim Use Work Plan.

A pre-construction meeting shall be held to address proper operating procedures for working on-site. This meeting shall consist of the EP and the construction manager. The HASP shall be reviewed during the pre-construction meeting.

### Summary of Soil and Groundwater Conditions

The soil boring locations completed in the vicinity of this project during preceding Phase II Investigations are shown on **Figure 1** and **Figure 2**, along with a summary of the soil sample results that exceeded the Project Action Limits (PALs). PAL exceedances in the soil samples relevant for the proposed project were limited to four inorganics (arsenic, manganese, thallium, and lead) and one semi-volatile organic compound (SVOC) (benzo[a]pyrene).

The shallow groundwater sample locations in the vicinity of this project are shown on **Figure 3**, along with a summary of the shallow groundwater results that exceeded the PALs. Shallow



groundwater PAL exceedances in the vicinity of the project consisted of four inorganics (cyanide, hexavalent chromium, vanadium, and thallium), one volatile organic compound (VOC) (chloroform), three SVOCs (benz[a]anthracene, naphthalene, and pentachlorophenol), total petroleum hydrocarbons diesel range organics (TPH-DRO), and Oil & Grease.

### **Delineation and Proposed Excavation**

A notable PAL exceedance of arsenic (896 mg/kg) was identified during the Parcel B13 Phase II Investigation at boring location B13-031-SB, which is located within the proposed Laydown Land. A supplemental investigation has since been performed to delineate the extent of arsenic contamination in the vicinity of this boring. The delineation results were presented in the Response Action Work Plan for Delineation Activities and Proposed Excavation of Arsenic Impacted Soil in Parcel B13 (dated June 12, 2019), which was approved by the MDE on June 26, 2019. **Figure 4** was extracted from the Response Action Work Plan and provides the arsenic delineation results. Arsenic-impacted soil was excavated as outlined in the Response Action Work Plan on July 16 and July 17, 2019. The Response Actions performed will be documented in a separate Response Action Completion Report.

### **Inspection and Maintenance**

Inspections will be required to verify that there are no potential exposure risks for Composite Workers performing duties on the Laydown Land caused by deficiencies in the interim measures. The crushed concrete temporary cap will be inspected monthly by Tradepoint Atlantic (the responsible party) or its designated agent. The responsible party will perform maintenance inspections, perform any maintenance of the interim remedy, and retain cap inspection records. The inspection records will be maintained and available for review at the Site.

Any breach or failure of the temporary cap will be reported to the MDE within 48 hours of the deficiency, and corrective action must be taken within 15 business days. If a corrective action is required, the MDE notification will include documentation of the observed conditions and the location of any repairs. In addition, the MDE and USEPA will be provided with a written notice at least 30 days prior to any planned removal or modification to the proposed interim measures once they have been installed.

### **Schedule**

At this time, EAG is requesting approval for Tradepoint Atlantic to proceed with the proposed work. Tradepoint Atlantic intends to commence work on the Site in March 2020 with an estimated three month duration.



**Reporting**

A brief Completion Letter Report will be submitted to the MDE upon finishing the project. The Completion Letter Report will document the installation of the proposed interim capping remedy on the Laydown Land.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group Inc. at 410-290-7775.

Respectfully submitted,  
ARM Group Inc.



Melissa Replogle, E.I.T.  
Project Engineer



T. Neil Peters, P.E.  
Senior Vice President



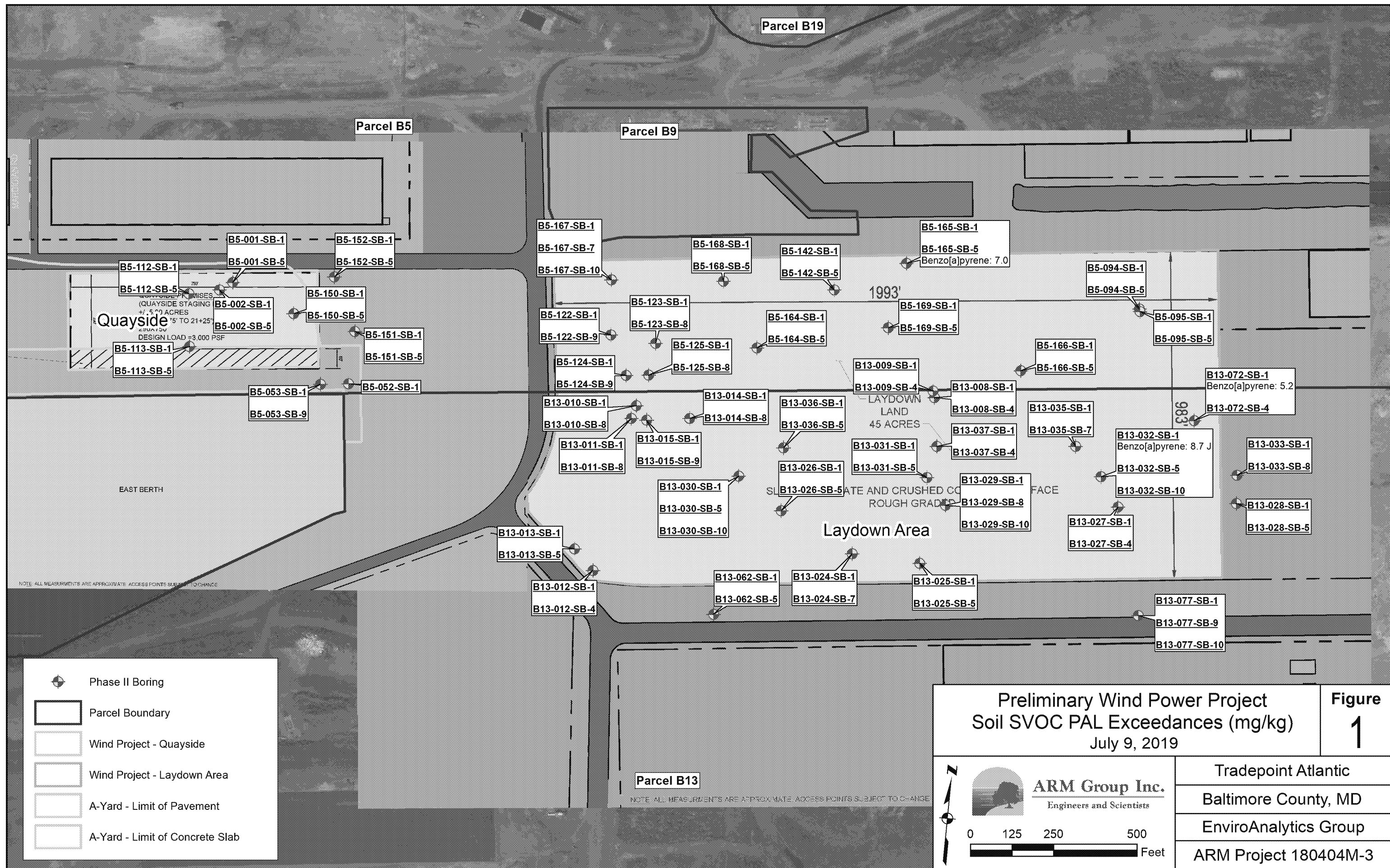
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## FIGURES

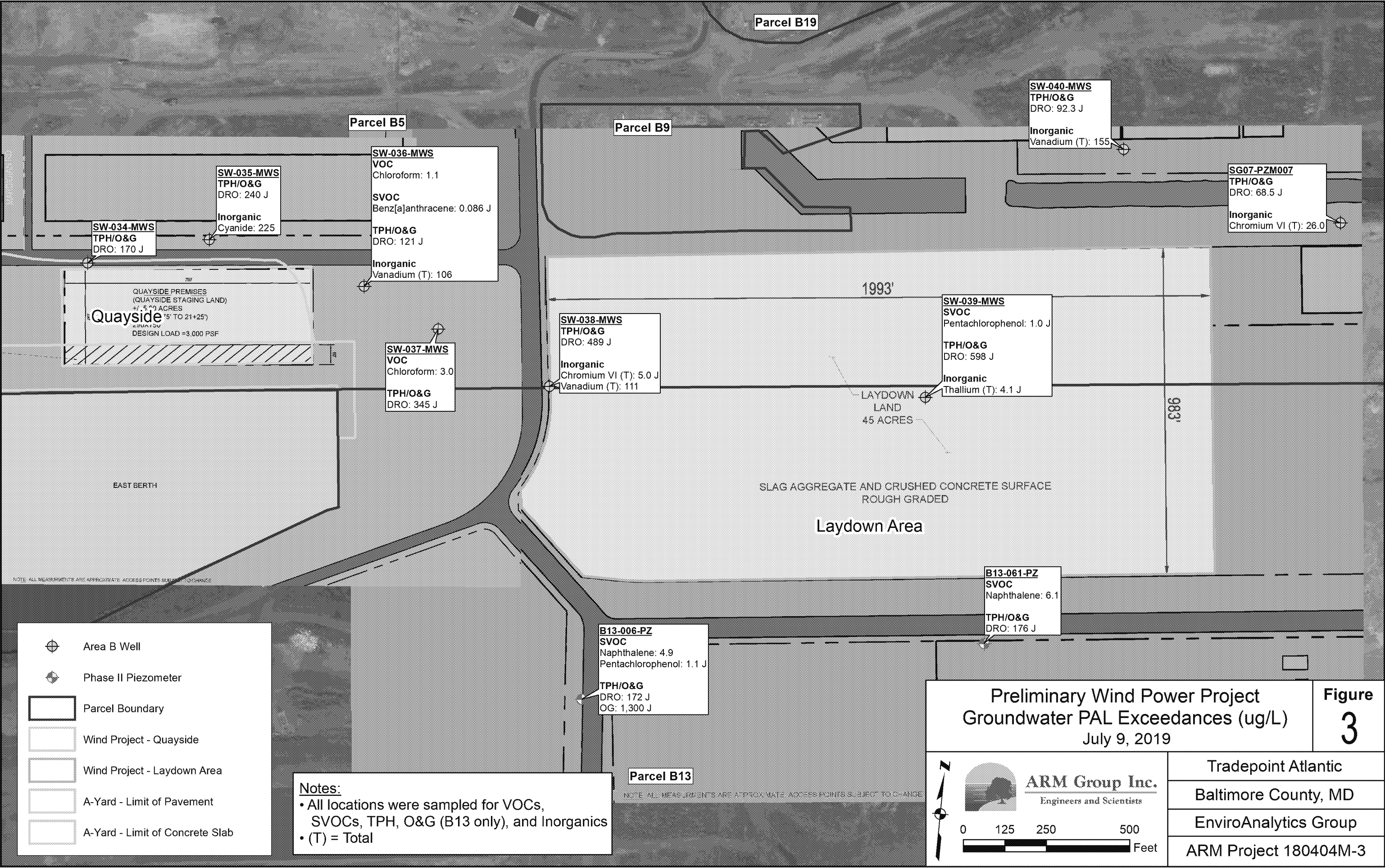
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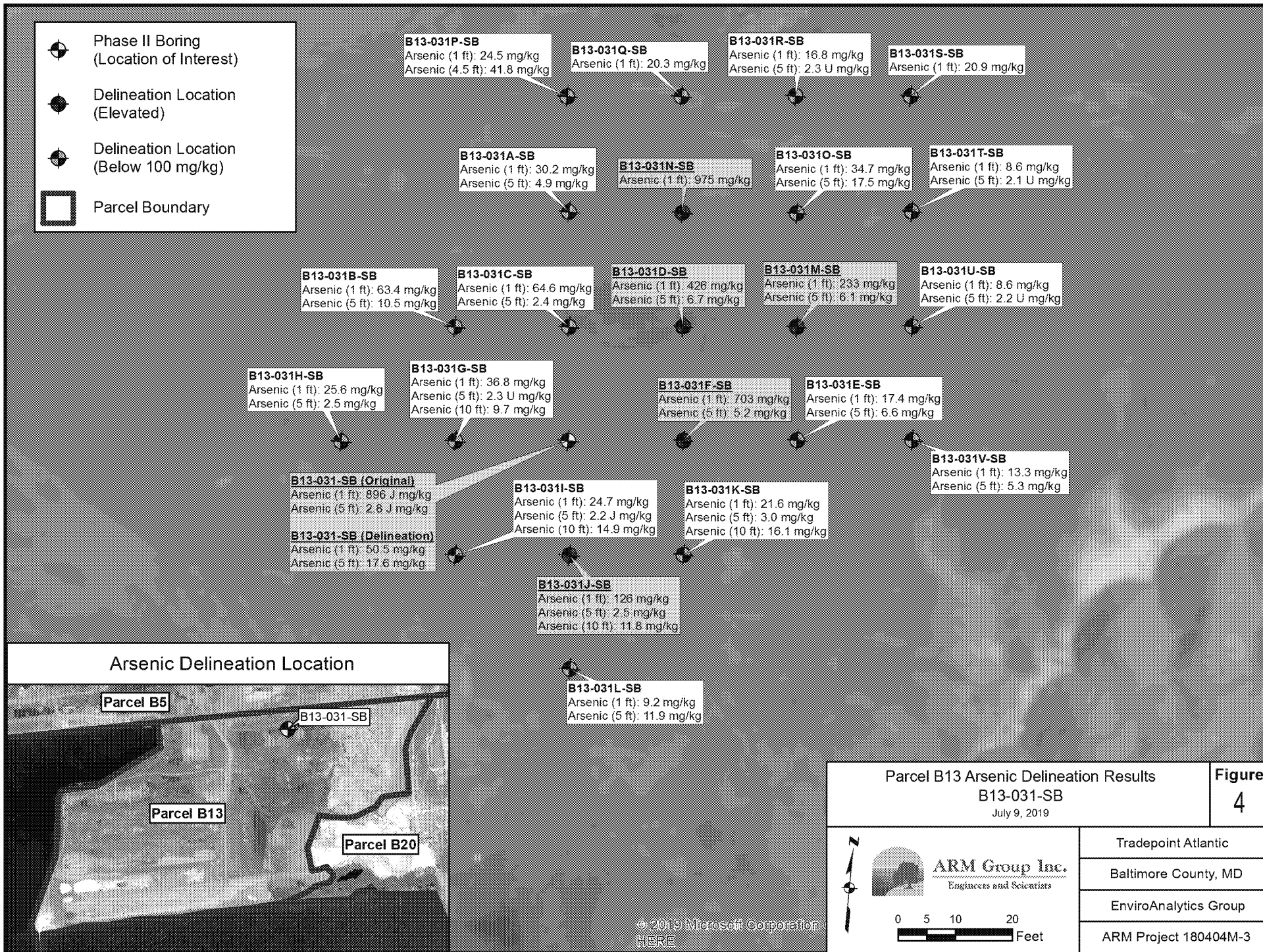












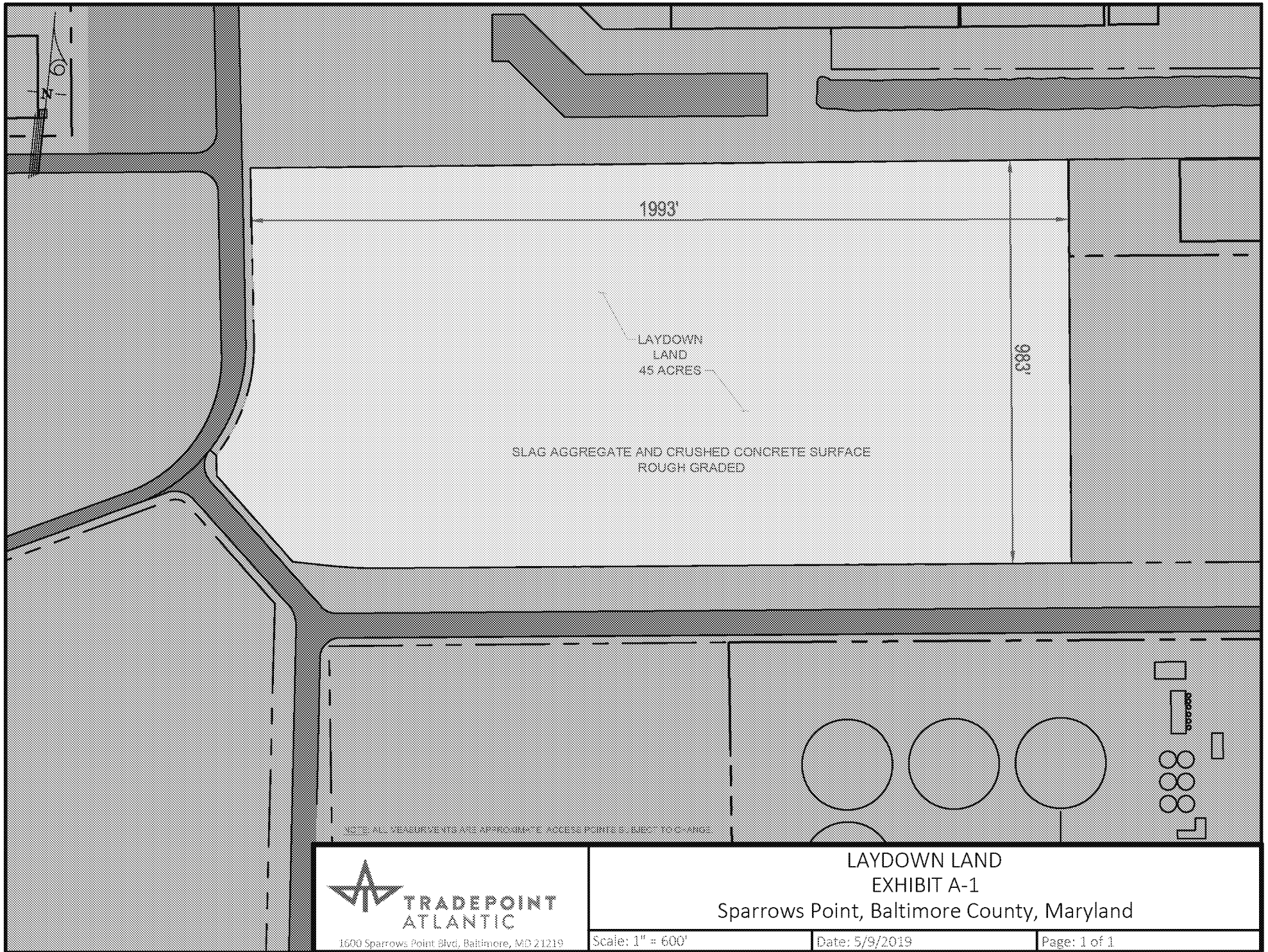
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## **ATTACHMENT 1**

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## **ATTACHMENT 2**

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